



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

April 6, 2020

VIA ECF

The Honorable Mary Kay Vyskocil
United States District Court
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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Re: *United States v. Navarro, et al.*, 20 Cr. 160

Dear Judge Vyskocil:

The Government respectfully writes pursuant to the Court's oral order during the April 2, 2020 teleconference to provide the Court with: 1) a proposed bail condition for each defendant in the above-captioned matter, in accordance with the Court's directive; and 2) proposed bail conditions for each defendant presented in districts other than the Southern District of New York.

First, with respect to each defendant in this matter, the Government respectfully requests that the Court impose the following bail condition: The defendant must comply with the rules and regulations of any licensing regimes to which he or she is subject, including appearances at any disciplinary proceedings, if required, consistent with any constitutional rights the defendant may have and wish to assert.¹

Second, with respect to the defendants presented in districts other than the Southern District of New York, the Government respectfully asks the Court to impose the following agreed-upon bail conditions, in addition to the condition proposed above:

1. Jorge Navarro
 - \$200,000 bond
 - Co-signed by 3 financially responsible persons
 - Supervision as directed by Pretrial Services
 - Travel restricted to the Southern District of New York, Eastern District of New York, the Southern District of Florida, and transit points in between, with permission to travel to the District of New Jersey with prior approval by Pretrial Services

¹ Defense counsel for Seth Fishman objects to the imposition of this bail condition. All remaining defense counsel have no objection to the proposed condition.

- Defendant to surrender any travel documents in defendant's possession and make no new applications
- Defendant to submit to drug testing and treatment as directed by Pretrial Services
- Defendant to have no contact with co-defendants outside the presence of counsel
- Defendant to have no contact with racehorses without supervision by the third party owner or agent of the premises where the horse is stabled
- Defendant to report criminal charges to the licensing authorities in any states in which he is licensed
- Defendant to meet all conditions within 21 days

2. Erica Garcia

- \$100,000 bond
- Co-signed by 2 financially responsible persons
- Supervision as directed by Pretrial Services
- Travel restricted to the Southern District of New York, Eastern District of New York, the Southern District of Florida, Middle District of Florida, and transit points in between
- Defendant to surrender any travel documents in defendant's possession and make no new applications
- Defendant to have no contact with co-defendants outside the presence of counsel
- Defendant to have no contact with racehorses without supervision by the third party owner or agent of the premises where the horse is stabled
- Defendant to report criminal charges to the licensing authorities in any states in which she is licensed
- Defendant to meet all conditions within 21 days

3. Marcos Zulueta

- \$100,000 bond
- Co-signed by 3 financially responsible persons
- Supervision as directed by Pretrial Services
- Travel restricted to the Southern District of New York, Eastern District of New York, District of New Jersey, Eastern District of Pennsylvania, District of Delaware, and transit points in between for purposes of interviewing for employment, but on the condition that Zulueta will make any employers aware of the Indictment, and notify the Government and Pretrial Services prior to accepting any employment opportunity
- Defendant to surrender any firearms and refrain from possessing a firearm
- Defendant to surrender any travel documents in defendant's possession and make no new applications
- Defendant to have no contact with co-defendants outside the presence of counsel
- Defendant to have no contact with racehorses without supervision by the third party owner or agent of the premises where the horse is stabled
- Defendant to report criminal charges to the licensing authorities in any states in which he is licensed
- Defendant to meet all conditions within 21 days

4. Gregory Skelton

- \$100,000 bond
- Co-signed by 1 financially responsible person
- Supervision as directed by Pretrial Services
- Travel restricted to the Southern District of New York, Eastern District of New York, Southern District of Indiana, and transit points in between
- Defendant to surrender any travel documents in defendant's possession and make no new applications
- Defendant to have no contact with co-defendants outside the presence of counsel
- Defendant may not possess any adulterated or misbranded drugs
- Defendant to continue current mental health treatment and sign release forms allowing the provider to communicate with Pretrial Services. If the defendant discontinues his current treatment, Pretrial Services can refer him to a contracted provider as deemed necessary
- Defendant to have no contact with racehorses without supervision by the third party owner or agent of the premises where the horse is stabled
- Defendant to report criminal charges to the licensing authorities in any states in which he is licensed
- Defendant to meet all conditions within 21 days

5. Lisa Giannelli

- \$100,000 bond
- Co-signed by 1 financially responsible person
- Supervision as directed by Pretrial Services
- Travel restricted to the Southern District of New York, Eastern District of New York, District of Delaware, District of Vermont, and transit points in between
- Defendant to surrender any travel documents in defendant's possession and make no new applications
- Defendant to have no contact with co-defendants outside the presence of counsel
- Defendant to refrain from conduct alleged in the Indictment
- Defendant to refrain from possessing a firearm
- Defendant to have no contact with racehorses without supervision by the third party owner or agent of the premises where the horse is stabled
- Defendant to report criminal charges to the licensing authorities in any states in which he is licensed
- Defendant to meet all conditions within 21 days

6. Jordan Fishman

- \$100,000 bond
- Co-signed by 1 financially responsible person
- Supervision as directed by Pretrial Services

- Travel restricted to the Southern District of New York, Eastern District of New York, Massachusetts, Connecticut, Maine, New Hampshire, and Rhode Island, and transit points in between. Defendant must notify Pretrial Services in advance of any travel outside Massachusetts.
- Defendant to surrender any travel documents in defendant's possession and make no new applications
- Defendant to have no contact with co-defendants outside the presence of counsel
- Defendant to have no contact with racehorses without supervision by the third party owner or agent of the premises where the horse is stabled
- Defendant shall not knowingly possess any performance-enhancing drugs
- Defendant to report criminal charges to the licensing authorities in any states in which he is licensed
- Defendant to meet all conditions within 21 days

7. Rick Dane Jr.

- \$100,000 bond
- Co-signed by 1 financially responsible person
- Supervision as directed by Pretrial Services
- Travel restricted to the Southern District of New York, Eastern District of New York, Eastern District of Pennsylvania, District of New Jersey, and transit points in between
- Defendant to surrender any travel documents in defendant's possession and make no new applications
- Defendant to have no contact with co-defendants outside the presence of counsel
- Defendant to maintain or actively seek employment and provide proof of employment to Pretrial Services
- Defendant to remove any firearms from his residence and refrain from possessing any firearms, ammunition, destructive devices, or other dangerous weapons
- Defendant to have no contact with racehorses without supervision by the third party owner or agent of the premises where the horse is stabled
- Defendant to report criminal charges to the licensing authorities in any states in which he is licensed
- Defendant to meet all conditions within 21 days

8. Christopher Oakes

- \$100,000 bond
- Co-signed by 2 financially responsible persons
- Supervision as directed by Pretrial Services
- Travel restricted to the Southern District of New York, Eastern District of New York, Western District of New York, Southern District of Florida, Middle District of Pennsylvania, and transit points in between
- Defendant to surrender any travel documents in defendant's possession and make no new applications
- Defendant to submit to drug testing and treatment as directed by Pretrial Services
- Defendant to refrain from excessive use of alcohol

- Defendant to receive mental health evaluation and treatment as deemed necessary by Pretrial Services
 - Defendant to have no contact with co-defendants outside the presence of counsel
 - Defendant to have no contact with racehorses without supervision by the third party owner or agent of the premises where the horse is stabled
 - Defendant to report criminal charges to the licensing authorities in any states in which he is licensed
 - Defendant to meet all conditions within 21 days
9. Jason Servis
- \$200,000 bond
 - Co-signed by 2 financially responsible persons or persons of moral suasion
 - Supervision as directed by Pretrial Services
 - Travel restricted to the Southern District of New York, Eastern District of New York, District of New Jersey, Southern District of Florida, and transit points in between
 - Defendant to surrender any travel documents in defendant's possession and make no new applications
 - Defendant to have no contact with co-defendants outside the presence of counsel
 - Defendant to have no contact with racehorses without supervision by the third party owner or agent of the premises where the horse is stabled
 - Defendant to report criminal charges to the licensing authorities in any states in which he is licensed
 - Defendant to meet all conditions within 21 days

[Continued]

10. Michael Kegley, Jr.

- \$100,000 bond
- Co-signed by 2 financially responsible persons
- Supervision as directed by Pretrial Services
- Travel restricted to the Southern District of New York, Eastern District of New York, Eastern District of Kentucky, Western District of Kentucky, Northern District of Ohio, and transit points in between
- Defendant to surrender any travel documents in defendant's possession and make no new applications
- Defendant to maintain or actively seek employment
- Defendant to have no contact with co-defendants outside the presence of counsel
- Defendant to refrain from knowingly possessing any performance-enhancing drugs
- Defendant to have no contact with racehorses without supervision by the third party owner or agent of the premises where the horse is stabled
- Defendant to report criminal charges to the licensing authorities in any states in which he is licensed
- Defendant to meet all conditions within 21 days

Very truly yours,

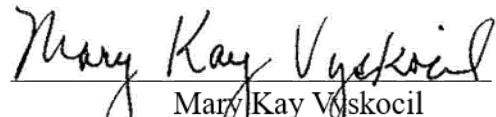
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Cc: All counsel (via ECF)

The bail conditions for all Defendants initially presented in other districts, as set forth in this letter, are adopted. Additionally, all Defendants, including those whose conditions were entered on March 9, 2020 by Magistrate Judge Wang, must comply with the following additional condition: The defendant must comply with the rules and regulations of any licensing regimes to which he or she is subject, including appearances at any disciplinary proceedings, if required, consistent with any constitutional rights the defendant may have and wish to assert. SO ORDERED.

Date: 4/6/2020
New York, New York


Mary Kay Viskocil
United States District Judge